

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 01 - 512
	:	
v.	:	DATE FILED: _____
	:	
VINCENT WILLIAMS,	:	VIOLATIONS:18 U.S.C. § 371 (Conspiracy to make
a/ka "Tate,"	:	false statements to federal firearms licensee - 1 count);
a/k/a "Taterhead,"	:	18 U.S.C. § 924(a)(1)(A) (Making false statements to
BRIAN ROGERS,	:	federal firearms licensee - 6 counts);
a/k/a "B,"	:	18 U.S.C. § 1962(c) (Participation in the affairs of an
JAMAIN WILLIAMS,	:	interstate enterprise through a pattern of racketeering
a/k/a "Jarmaine,"	:	activity (RICO) - 1 count);
a/k/a "Jay,"	:	18 U.S.C. § 1959(a)(5) (Conspiracy to commit murder in
a/k/a "Main,"	:	aid of racketeering activity - 3 counts);
ANDRE COOPER,	:	18 U.S.C. § 1959(a)(1) (Murder in aid of racketeering
a/k/a "Dre,"	:	activity - 4 counts);
MARK ROGERS,	:	18 U.S.C. § 1512(a)(1)(A) (Tampering with a witness by
a/k/a "Black Mark,"	:	murder - 1 count);
SHANE TAYLOR,	:	18 U.S.C. § 1513(a)(1)(B) (Retaliation against a witness -
RASHEE GRANT,	:	1 count);
a/k/a "Bae-Bae," and	:	18 U.S.C. § 924(c) (Using and carrying a firearm during
DAMIR ROBERTS,	:	and in relation to a crime of violence or possession in
a/k/a "Dams"	:	furtherance of a drug trafficking crime - 6 counts);
	:	18 U.S.C. § 3 (Accessory after the fact - 2 counts);
	:	18 U.S.C. § 1512(b)(1) and (2) (Tampering with a
	:	witness - 1 count);
	:	21 U.S.C. § 846 (Conspiracy to distribute cocaine - 1
	:	count);
	:	21 U.S.C. § 860 (Conspiracy to distribute cocaine in a
	:	school zone- 1 count);
	:	21 U.S.C. § 841(a)(1) (Distribution of and possession
	:	with the intent to distribute cocaine - 16 counts);
	:	18 U.S.C. § 2 (Aiding and abetting);
	:	Notice of forfeiture
	:	
	:	
	:	

THIRD SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment:

1. Pursuant to Title 18, United States Code, Section 924(a)(1)(A), it is a criminal offense to knowingly make any false statement or representation with respect to the information required to be kept in the records of a person licensed under Chapter 44 of Title 18, United States Code (Sections 921-929).

2. Persons licensed under Title 18, United States Code, Chapter 44, included federal firearms licensees (“FFL”) licensed by the Bureau of Alcohol, Tobacco and Firearms (“ATF”) of the United States Department of the Treasury and doing business within the Eastern District of Pennsylvania and elsewhere.

3. Miller’s Sporting Goods (“Miller’s”), located at 1578 B Chichester Avenue, Linwood, Pennsylvania, was a federally licensed firearms dealer.

4. Ken Crane Sporting Goods (“Crane’s”), located at 310 Sloan Street, Crum Lynne, Pennsylvania, was a federally licensed firearms dealer.

5. FFL dealers were licensed, among other things, to sell firearms and ammunition. Various rules and regulations contained in and promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929) govern the manner in which an FFL may sell firearms and ammunition.

6. The rules and regulations governing FFL holders required that a person seeking to purchase a firearm fill out a “Firearms Transaction Record,” ATF Form 4473. Part of Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm, rather than a “straw purchaser” acquiring the

firearm on behalf of another. The Form 4473 in effect at the times relevant to this Indictment contained language explaining what it means to be an actual buyer:

WARNING - The Federal firearms laws require that the individual filling out this form must be buying the firearm for himself or herself or as a gift. Any individual who is not buying the firearm for himself or herself or as a gift, but who completes this form, violates the law. Example: Mr. Smith asks Mr. Jones to purchase a firearm for Mr. Smith. Mr. Smith gives Mr. Jones the money for the firearm. If Mr. Jones fills out this form, he will violate the law. However, if Mr. Jones buys a firearm with his own money to give to Mr. Smith as a birthday present, Mr. Jones may lawfully complete this form. A licensee who knowingly delivers a firearm to an individual who is not buying the firearm for himself or herself or as a gift violates the law by maintaining a false ATF F 4473.

7. FFL holders were required, pursuant to regulations promulgated by ATF under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL, including the buyer's home address and date of birth.

8. From on or about August 12, 2000 through on or about September 19, 2000 at Linwood, Crum Lynne and Chester, in the Eastern District of Pennsylvania, the defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

conspired and agreed with Tracey Saunders and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to violate Title 18, United States Code, Section 924(a)(1)(A), by knowingly making false statements and representations concerning information required to be kept by a federally licensed firearms dealer, that is, the identity of the actual buyer of firearms.

MANNER AND MEANS OF THE CONSPIRACY

9. It was part of the conspiracy that defendant VINCENT WILLIAMS, a/k/a

“Tate,” a/k/a “Taterhead,” [hereinafter VINCENT WILLIAMS], directed Tracey Saunders to act as a straw purchaser and buy firearms for himself and others, and that he, and others who he authorized, chose the firearms and gave her money to purchase the firearms on their behalf.

OVERT ACTS

In furtherance of the conspiracy, the following overt acts were committed within the Eastern District of Pennsylvania:

August 12, 2000

1. On or about August 12, 2000, defendant, VINCENT WILLIAMS asked Tracey Saunders to buy firearms for him.
2. On or about August 12, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller’s, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, with cash provided by defendant VINCENT WILLIAMS.
3. On or about August 12, 2000, at Miller’s, Tracey Saunders completed ATF Form 4473 in connection with the purchase of the Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, falsely representing that she was the actual buyer of the firearm.
4. On or about August 12, 2000, in return for a fee, Tracey Saunders gave the Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, to another, that is, defendant VINCENT WILLIAMS.

August 14, 2000

5. On or about August 14, 2000, at the direction of defendant VINCENT

WILLIAMS, Tracey Saunders purchased, at Crane's, a Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, with cash provided by defendant VINCENT WILLIAMS.

6. On or about August 14, 2000, at Crane's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of a Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, falsely representing that she was the actual buyer of the firearm.

7. On or about August 14, 2000, in return for a fee, Tracey Saunders gave the Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, to another, that is, defendant VINCENT WILLIAMS.

August 16, 2000

8. On or about August 16, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956.

9. On or about August 16, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, falsely representing that she was the actual buyer of the firearm.

10. On or about August 16, 2000, in return for a fee, Tracey Saunders gave the Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, to another.

August 31, 2000

11. On or about August 31, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Crane's, a Chinese SKS 7.62x39 gauge rifle, serial number R22001495.

12. On or about August 31, 2000, at Crane's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Chinese SKS 7.62x39 gauge rifle, serial number R22001495, falsely representing that she was the actual buyer of the firearm.

13. On or about September 6, 2000, in return for a fee, Tracey Saunders gave the Chinese SKS 7.62x39 gauge rifle, serial number R220014957, to Brian Rogers.

September 6, 2000

14. On or about September 6, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, a Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277.

15. On or about September 6, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277, falsely representing that she was the actual buyer of the firearm.

16. On or about September 6, 2000, in return for a fee, Tracey Saunders gave the Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277, to another.

September 16, 2000

17. On or about September 16, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, a Ruger forty-five caliber semi-automatic

pistol, Model P90T, serial number 661-80733, with cash provided by defendant VINCENT WILLIAMS.

18. On or about September 16, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733, falsely representing that she was the actual buyer of the firearm.

19. On or about September 16, 2000, in return for a fee, Tracey Saunders gave the Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733, to another, that is, defendant VINCENT WILLIAMS.

September 19, 2000

20. On or about September 19, 2000, at the direction of defendant VINCENT WILLIAMS, Tracey Saunders purchased, at Miller's, a Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, with cash provided by defendant VINCENT WILLIAMS.

21. On or about September 19, 2000, at Miller's, Tracey Saunders completed ATF Form 4473 in connection with the purchase of this Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, falsely representing that she was the actual buyer of the firearm.

22. On or about September 19, 2000, in return for a fee, Tracey Saunders gave the Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, to another, that is, defendant VINCENT WILLIAMS.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 12, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A053796, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 14, 2000, at Crum Lynne, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335, from a federally licensed firearms dealer, that is, Ken Crane Sporting Goods, 310 Sloan Street, Crum Lynne, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 16, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, an Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 6, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Ruger 40 caliber semi-automatic pistol, Model P944T, serial number 340-75277, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Ruger 45 caliber semi-automatic pistol, Model P90T, serial number 661-80733, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 19, 2000, at Linwood, in the Eastern District of Pennsylvania,
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

willfully caused the making of, and knowingly aided and abetted the making of, false statements and representations with respect to information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition of a firearm, that is, a Magnum Research 44 caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310, from a federally licensed firearms dealer, that is, Miller's Sporting Goods, 1576 B Chichester Avenue, Linwood, Pennsylvania, in that Tracey Saunders falsely represented on Department of Treasury ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm, when in fact defendant VINCENT WILLIAMS and she knew that statement to be false and fictitious.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

THE RACKETEERING VIOLATION

1. From in or about 1996, to in or about December 2002, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae," and
DAMIR ROBERTS,
a/k/a "Dams,"

with others known and unknown to the grand jury, being persons employed by and associated with the "Boyle Street Boys," more fully described below, which was an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of Racketeering Acts 1 through 24 as set forth in Paragraph 19 below.

THE RACKETEERING ENTERPRISE

2. The criminal organization, which came to be known as the “Boyle Street Boys,” was formed in or before approximately 1996 by the defendants JAMAIN WILLIAMS and VINCENT WILLIAMS, who are brothers. Thereafter, defendants JAMAIN WILLIAMS and VINCENT WILLIAMS recruited defendants ANDRE COOPER, MARK ROGERS, his cousin BRIAN ROGERS, SHANE TAYLOR, RASHEE GRANT, DAMIR ROBERTS, and Antonio Rykard, a juvenile [now deceased], and others both known and unknown to the grand jury as additional members of the Boyle Street Boys to provide cocaine to purchasers as well as to other members of their enterprise. The six senior members of the Boyle Street Boys, JAMAIN WILLIAMS, VINCENT WILLIAMS, ANDRE COOPER, BRIAN ROGERS, MARK ROGERS, SHANE TAYLOR, came to be known as the “oldheads.” Those that acted at the “oldheads” direction, including RASHEE GRANT, DAMIR ROBERTS, Antonio Rykard, and others both known and unknown to the grand jury, came to be known as the “youngboys.” JAMAIN WILLIAMS and VINCENT WILLIAMS and others under their direction and control began delivering quantities of Boyle Street Boys’ cocaine at different locations in the Highland Gardens section of Chester, Pennsylvania, including, but not limited to, the 2700 block of Boyle Street, 2719 Smithers Street, and the area in and around DeMarcos store. The Boyle Street Boys eventually took control of the drug sales in the 2700 block of Boyle Street, Chester, Pennsylvania.

3. The Boyle Street Boys, including its leadership, members, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4) (hereinafter “the enterprise”), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a

common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

THE PURPOSES OF THE ENTERPRISE

4. The purposes of the enterprise included manufacturing and distributing cocaine, a Schedule II controlled substance, in the Highland Gardens section of Chester, Pennsylvania, collecting money from the distribution of cocaine, and, where necessary, using and threatening violence, including murder, to sustain the enterprise and further its goals.

MANNER AND MEANS OF THE ENTERPRISE

5. Members of the enterprise used different locations within the Highland Gardens section of Chester, Pennsylvania, to store, package, and sell their cocaine, including, but not limited to, 2719 Smithers Street, 2702 Boyle Street, and 1210 Culhane Street.

6. Members of the enterprise routinely used physical violence and threats of violence to: (a) discipline and maintain control over the enterprise's workers, (b) keep members of the enterprise and others from cooperating with law enforcement authorities, or providing law enforcement authorities with any information or testimony against members of the enterprise, (c) deter and eliminate competition from other drug dealers, and (d) maintain their position of power and status in the area in which they dealt drugs.

7. To further their objectives of physical violence and threats, members of the enterprise routinely carried loaded firearms, had firearms available at hidden locations, and wore protective bulletproof vests.

8. To have firearms available for themselves and others in their enterprise, defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, BRIAN ROGERS, and ANDRE COOPER used other persons to "straw purchase" firearms, that is, the other person would

purchase a firearm in his or her name intending to later illegally resell or give the firearms to defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, BRIAN ROGERS, or ANDRE COOPER. One of the persons who the members of the enterprise paid to straw purchase firearms for the enterprise was Tracey Saunders.

9. To protect the enterprise, the members used violence to intimidate and silence potential witnesses. When members of the enterprise became concerned that a person may testify against them, members of the enterprise would commit acts of violence, including murder, to silence those persons.

10. To protect the reputation of the enterprise and to ensure the continued status and stature of the enterprise in the neighborhood, the members used violence to demonstrate their power. When members of the enterprise became concerned that a person may not be showing them proper respect, members of the enterprise would commit acts of violence, including murder, to insure their continued status and position of power in the area where the enterprise dealt drugs.

ROLES OF THE DEFENDANTS

The defendants participated in the operation and management of the enterprise as follows:

11. The defendant JAMAIN WILLIAMS organized, controlled, and supervised the operation of the enterprise. On numerous occasions between 1996 and 2002, JAMAIN WILLIAMS participated in the possession with the intent to distribute and the distribution of cocaine. JAMAIN WILLIAMS usually carried a firearm and frequently wore a bulletproof vest. JAMAIN WILLIAMS recruited numerous persons to join the enterprise. JAMAIN WILLIAMS conspired to, and aided and abetted, the murders of Tracey Saunders, Antonio Rykard, and

Karriem Washington. JAMAIN WILLIAMS murdered Randolph Harris.

12. The defendant VINCENT WILLIAMS organized, controlled, and supervised the operation of the enterprise. On numerous occasions between 1996 and 2002, VINCENT WILLIAMS participated in the possession with the intent to distribute and the distribution of cocaine. VINCENT WILLIAMS usually carried a firearm and frequently wore a bulletproof vest. VINCENT WILLIAMS conspired to, and aided and abetted, the murders of Tracey Saunders and Karriem Washington. VINCENT WILLIAMS murdered Antonio Rykard.

13. The defendant ANDRE COOPER participated in the possession with the intent to distribute and the distribution of cocaine on numerous occasions between 1996 and 2002. ANDRE COOPER also acted as an enforcer, armed with various loaded handguns, to guard the corner of Boyle and Culhane Streets and other locations where cocaine was being sold by members of the enterprise as well as the “stash” locations where the cocaine was packaged or stored until needed for distribution by the enterprise. ANDRE COOPER usually carried a firearm and frequently wore a bulletproof vest. ANDRE COOPER conspired to, and aided and abetted, the murders of Tracey Saunders and Antonio Rykard. ANDRE COOPER murdered Karriem Washington.

14. The defendant BRIAN ROGERS participated in the possession with the intent to distribute and the distribution of cocaine on numerous occasions between 1996 and 2002. BRIAN ROGERS also acted as an enforcer, armed with various loaded handguns, to guard the corner of Boyle and Culhane Streets and other locations where cocaine was being sold by members of the enterprise as well as the “stash” locations where the cocaine was packaged or stored until needed for distribution by the enterprise. BRIAN ROGERS usually carried a firearm and frequently wore a bulletproof vest. BRIAN ROGERS conspired to murder Antonio Rykard.

BRIAN ROGERS murdered Tracey Saunders.

15. The defendant MARK ROGERS was a member of the enterprise who, among other duties, at various times between 1996 and 2002 possessed with the intent to distribute cocaine, delivered cocaine, and picked up proceeds from the distribution of cocaine. MARK ROGERS usually carried a firearm and frequently wore a bulletproof vest. MARK ROGERS conspired to murder Tracey Saunders and Antonio Rykard.

16. The defendant SHANE TAYLOR was a member of the enterprise who, among other duties, at various times between 1996 and 2002 possessed with the intent to distribute cocaine, delivered cocaine, and picked up proceeds from the distribution of cocaine. SHANE TAYLOR usually carried a firearm. SHANE TAYLOR conspired to murder Tracey Saunders.

17. The defendant RASHEE GRANT was a member of the enterprise who conducted street level drug sales and acted as a “lookout,” watching for the presence of police officers and other agents of law enforcement while drug sales were ongoing, among other duties performed for the enterprise. RASHEE GRANT usually had access to a firearm.

18. The defendant DAMIR ROBERTS was a member of the enterprise who conducted street level drug sales and acted as a “lookout,” watching for the presence of police officers and other agents of law enforcement while drug sales were ongoing, among other duties performed for the enterprise. DAMIR ROBERTS usually had access to a firearm.

PATTERN OF RACKETEERING ACTIVITY

19. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5) consisted of the following acts:

RACKETEERING ACT NO. 1

From in or about 1996, to in or about December 2002, in the Eastern District of

Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae," and
DAMIR ROBERTS,
a/k/a "Dams,"

conspired and agreed with others known and unknown to the grand jury, to knowingly and intentionally manufacture and distribute more than 5 kilograms of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

RACKETEERING ACT NO. 2

On or about October 9, 1997, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally possessed with the intent to distribute sixteen packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 3

On or about December 1, 1997, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

MARK ROGERS,
a/k/a "Black Mark,"

knowingly and intentionally possessed with the intent to distribute sixteen packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 4

On or about January 17, 1998, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead," and
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"

knowingly and intentionally possessed with the intent to distribute a substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 5

On or about May 11, 1998, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed, and aided and abetted the distribution of, a packet of a

mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT NO. 6

On or about March 2, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"

knowingly and intentionally possessed with the intent to distribute four packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 7

On the dates listed below, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

committed the following acts involving murder, any one of which alone constitutes Racketeering Act 7:

(a) From in or about June 1999 to on or about July 10, 1999, the

defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, and ANDRE COOPER did commit an act involving murder, that is, with the intent of promoting and facilitating the commission of the crime of murder, did agree to commit the intentional killing of Karriem Washington and did commit an overt act in pursuance thereof, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502.

(b) On or about July 10, 1999, the defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, and ANDRE COOPER knowingly committed an act involving murder, that is the intentional killing of Karriem Washington, which killing was willful, deliberate and premeditated, and the knowing aiding and abetting, and willful causing of that murder with the intent to promote or facilitate, aid or attempt to aid, and solicit another to commit, the intentional killing of Karriem Washington, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502 and 306.

RACKETEERING ACT NO. 8

On or about January 8, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a “Dre,” and
MARK ROGERS,
a/k/a “Black Mark,”

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute of, approximately 137 packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT NO. 9

On or about April 22, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"

knowingly committed an act involving murder, that is, the intentional killing of Randolph Harris, which killing was willful, deliberate and premeditated, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502.

RACKETEERING ACT NO. 10

The defendants named below committed the following acts, any one of which alone constitutes Racketeering Act 10:

(a) From in or about March 2000 to on or about April 25, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,

did commit an act involving murder, that is, with the intent of promoting and facilitating the commission of the crime of murder, did agree to commit the intentional killing of Antonio Rykard, and did commit an overt act in pursuance thereof, in violation of Title 18, Pennsylvania

Consolidated Statutes Annotated, Sections 903 and 2502.

(b) On or about April 25, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a “Tate,”
a/k/a “Taterhead,” and
ANDRE COOPER,
a/k/a “Dre,”

knowingly committed an act involving murder, that is the intentional killing of Antonio Rykard, which killing was willful, deliberate and premeditated, and the knowing aiding and abetting, and willful causing of that murder with the intent to promote or facilitate, aid or attempt to aid, and solicit another to commit, the intentional killing of Antonio Rykard, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502 and 306.

RACKETEERING ACT NO. 11

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a “Dre,”

knowingly and intentionally possessed with the intent to distribute one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 12

On or about July 11, 2001, at Linwood, in the Eastern District of Pennsylvania,

the defendant

BRIAN ROGERS,
a/k/a "B,"

knowingly and intentionally possessed with the intent to distribute one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 13

The defendants named below committed the following acts, any one of which alone constitutes Racketeering Act 13:

(a) From in or about August 2001 to on or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark," and
SHANE TAYLOR,

did commit an act involving murder, that is, with the intent of promoting and facilitating the commission of the crime of murder, did agree to commit the intentional killing of Tracey Saunders, and did commit an overt act in pursuance thereof, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502.

(b) On or about October 8, 2001, at Chester, Delaware County, in the

Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

knowingly committed an act involving murder, that is the intentional killing of Tracey Saunders, which killing was willful, deliberate and premeditated, and the knowing aiding and abetting, and willful causing of that murder with the intent to promote or facilitate, aid or attempt to aid, and solicit another to commit, the intentional killing of Tracey Saunders, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502 and 306.

(c) On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

murdered, aided and abetted, and willfully caused the murder of Tracey Saunders, as defined in Title 18, United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious,

and premeditated killing with malice aforethought, with the intent to prevent her from testifying at an official proceeding, that is, her testimony against her co-defendant Vincent Williams at his trial, and to prevent communication by Tracey Saunders to a law enforcement officer or judge of the United States of information relating to the commission of a federal offense, in violation of the laws of the United States, that is, Title 18, United States Code, Sections 2, 1111(a), and 1512(a)(1)(A) and (C), and 1512(a)(2)(A).

(d) On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

murdered, aided and abetted, and willfully caused the murder of Tracey Saunders as defined in Title 18, United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought, with the intent to retaliate against her for providing to a law enforcement officer information relating to the commission or possible commission of a federal offense, in violation of the laws of the United States, that is, Title 18, United States Code, Sections 2, 1111(a), and 1513(a)(1)(B) and (2)(A).

RACKETEERING ACT NO. 14

On or about June 12, 2002, at Chester, Delaware County, in the Eastern District

of

Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally possessed with the intent to distribute three packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 15

On or about July 8, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 16

In or about the summer of 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"

knowingly used intimidation and physical threat, threatened, and corruptly persuaded, and attempted to do so, and engaged in misleading conduct toward another person with the intent to

influence and prevent the testimony of a person in an official proceeding, and with the intent to cause and induce a person to withhold testimony from an official proceeding, against BRIAN ROGERS, in violation of Title 18, United States Code, Section 1512(b)(1) and (2).

RACKETEERING ACT NO. 17

On or about August 26, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 18

On or about August 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 19

On or about September 5, 2002, at Chester, Delaware County, in the Eastern

District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 20

On or about September 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 21

On or about October 7, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

RASHEE GRANT,
a/k/a "Bae-Bae,"

committed the following acts, any one of which alone constitutes Racketeering Act 23:

(a) knowingly and intentionally distributed five packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(b) knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 22

On or about October 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally distributed a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

RACKETEERING ACT NO. 23

On or about October 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
SHANE TAYLOR

knowingly and intentionally distributed, and did aid and abet the distribution of, one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT NO. 24

On or about November 13, 2002, at Chester, Delaware County, in the Eastern

District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed one packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1962(c).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this Indictment, the “Boyle Street Boys,” as more fully described in Paragraphs 2 through 18 of Count Eight of this Indictment, which are realleged and incorporated here, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely the Boyle Street Boys [hereinafter "the enterprise"], that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903, 2502(a), and 306, and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846.

3. From in or about August 2001 through on or about October 8, 2001, in the Eastern District of Pennsylvania, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, a thing of pecuniary value from the enterprise, and for the purpose of maintaining and increasing position in the enterprise, the defendants

VINCENT WILLIAMS,
a/k/a “Tate,”
a/k/a “Taterhead,”
BRIAN ROGERS,
a/k/a “B,”
JAMAIN WILLIAMS,
a/k/a “JarMain,”
a/k/a “Jay,”
a/k/a “Main,”
ANDRE COOPER,

a/k/a “Dre,”
MARK ROGERS,
a/k/a “Black Mark,” and
SHANE TAYLOR,

conspired and agreed to commit the knowing and intentional murder of Tracey Saunders in violation of the laws of the United States, that is, tampering with a witness by murder, in violation of Title 18, United States Code, Section 1512(a)(1)(A), and retaliation against a witness by murder, in violation of Title 18 United States Code, Section 1513(a)(1)(B), and the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Nine of this Indictment are incorporated here.
2. On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, a thing of pecuniary value from the enterprise, and for the purpose of maintaining and increasing position in the enterprise, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally murdered, knowingly aided and abetted, and willfully caused the murder of, and with the intent to promote and facilitate, aided, agreed or attempted to aid, and solicited another to commit, the murder of Tracey Saunders, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502(a) and 306.

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

murdered, aided and abetted, and willfully caused the murder of Tracey Saunders, as defined in Title 18, United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought, with the intent to prevent her from testifying at an official proceeding, that is, her testimony against her co-defendant Vincent Williams at his trial, and to prevent communication by Tracey Saunders to a law enforcement officer or judge of the United States of information relating to the commission of a federal offense, that is, conspiracy to make false statements and the making of false statements as charged in Counts One through Seven of this Indictment.

All in violation of Title 18, United States Code, Sections 2, 1111(a), and 1512(a)(1)(A) and (C), and 1512(a)(2)(A).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

murdered, aided and abetted, and willfully caused the murder of Tracey Saunders as defined in Title 18, United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought, with the intent to retaliate against her for providing to a law enforcement officer information relating to the commission or possible commission of a federal offense, that is, conspiracy to make false statements and the making of false statements as charged in Counts One through Seven of this Indictment.

All in violation of Title 18, United States Code, Sections 2, 1111(a), and 1513(a)(1)(B) and (2)(A).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, defendant

BRIAN ROGERS,
a/k/a "B,"

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, murder in aid of racketeering, the killing of a witness, and retaliation against a witness as charged in Counts Ten, Eleven, and Twelve of this Indictment, knowingly used and carried a firearm to commit murder, as defined in Title 18 United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and (j)(1), and 1111(a).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Nine of this Indictment are incorporated here.
2. From in or about March 2000 through on or about April 25, 2000, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"
ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

conspired and agreed to commit the knowing and intentional murder of Antonio Rykard in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Nine of this Indictment are incorporated here.
2. On or about April 25, 2000, at Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead," and
ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally murdered, knowingly aided and abetted, and willfully caused the murder of, and with the intent to promote or facilitate, aided, agreed or attempted to aid, and solicited another to commit, the murder of Antonio Rykard, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502(a) and 306.

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2000, at Philadelphia, in the Eastern District of Pennsylvania, the
defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

during and in relation to a crime of violence for which he may be prosecuted in a court of the
United States, that is, the murder of Antonio Rykard as charged in Count Fifteen of this
Indictment, knowingly used and carried a firearm to commit murder, as defined in Title 18,
United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and
premeditated killing with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and (j)(1), and
1111(a).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2000, at Philadelphia, in the Eastern District of Pennsylvania, the
defendants

JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
MARK ROGERS,
a/k/a "Black Mark,"

knowing that Vincent Williams and Andre Cooper had committed an offense against the United States, that is, the murder of Antonio Rykard, and aiding and abetting same, in violation of Title 18, United States Code, Sections 1959(a)(1) and 2, as charged in Count Fifteen of this Indictment, and using of a firearm during a crime of violence, in violation of Title 18, United States Code, Section 924(c), as charged in Count Sixteen of this Indictment, did receive, relieve, comfort and assist Vincent Williams and Andre Cooper in order to hinder and prevent their apprehension, trial and punishment.

In violation of Title 18, United States Code, Section 3.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Nine of this Indictment are incorporated here.
2. On or about April 22, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, the defendant

JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"

knowingly and intentionally murdered Randolph Harris, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502(a).

In violation of Title 18, United States Code, Section 1959(a)(1).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 22, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a “JarMain,”
a/k/a “Jay,”
a/k/a “Main,”

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the murder of Randolph Harris as charged in Count Eighteen of this Indictment, knowingly used and carried a firearm to commit murder, as defined in Title 18, United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and (j)(1), and 1111(a).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 22, 2000, at Chester, Delaware County, and other locations, in the Eastern District of Pennsylvania, the defendants

BRIAN ROGERS,
a/k/a "B,"
ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

knowing that Jamain Williams had committed an offense against the United States, that is, the murder of Randolph Harris, in violation of Title 18, United States Code, Section 1959(a)(1), as charged in Count Eighteen of this Indictment, and using of a firearm during a crime of violence, in violation of Title 18, United States Code, Section 924(c), as charged in Count Nineteen of this Indictment, did receive, relieve, comfort and assist Jamain Williams in order to hinder and prevent his apprehension, trial and punishment.

In violation of Title 18, United States Code, Section 3.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Nine of this Indictment are incorporated here.
2. In or about the month of June 1999 through on or about July 10, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

conspired and agreed to commit the knowing and intentional murder of Karriem Washington in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Nine of this Indictment are incorporated here.
2. On or about July 10, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main," and
ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally murdered, knowingly aided and abetted, and willfully caused the murder of, and with the intent to promote or facilitate, aided, agreed or attempted to aid, and solicited another to commit, the murder of Karriem Washington, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502(a) and 306.

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 10, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a “Dre,”

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the murder of Karriem Washington as charged in Count Twenty-Two of this Indictment, knowingly used and carried a firearm to commit murder, as defined in Title 18, United States Code, Section 1111, that is, an unlawful, willful, deliberate, malicious, and premeditated killing with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and (j)(1), and 1111(a).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or about the summer of 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a “JarMain,”
a/k/a “Jay,”
a/k/a “Main,”

knowingly used intimidation and physical threat, threatened, and corruptly persuaded, and attempted to do so, and engaged in misleading conduct toward another person with the intent to influence and prevent the testimony of a person in an official proceeding, and with the intent to cause and induce a person to withhold testimony from an official proceeding, against BRIAN ROGERS.

In violation of Title 18, United States Code, Section 1512(b)(1) and (2).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about 1996 to in or about December 2002, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae," and
DAMIR ROBERTS,
a/k/a "Dams,"

conspired and agreed with others known and unknown to the grand jury to knowingly and intentionally distribute more than 5 kilograms of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that the defendants:

2. Operated a drug organization, which came to be known as the Boyle Street Boys drug organization, the purpose of which was to distribute cocaine, a Schedule II controlled substance [hereinafter simply referred to as "cocaine"], in the Highland Gardens section of

Chester, Pennsylvania.

3. Hid cocaine which they sold to customers who came to the Boyle Street area of Highland Gardens to purchase cocaine at various “stash” locations, including abandoned houses and other locations near the corner of Boyle and Culhane Streets, in order to avoid having drugs on their person in the event police were in the area.

4. Used various locations to store and package the cocaine, including 2702 Boyle Street, 2719 Smithers Street, and 1210 Culhane Street, all in Highland Gardens, Chester, Pennsylvania.

5. Utilized violence or the threat of violence to discipline and maintain control over the organization’s workers.

6. Utilized violence or the threat of violence to keep members of the organization and others from cooperating with law enforcement authorities, or providing law enforcement authorities with any information or testimony against members of the organization.

7. Utilized violence or the threat of violence to deter and eliminate competition from other drug dealers as well as maintain their position of power and status in the area in which they dealt drugs.

8. Utilized juveniles to sell the Boyle Street Boys’ cocaine.

9. Carried loaded firearms, had firearms available at hidden locations, and wore protective bulletproof vests to protect themselves against possible attack by rival drug dealers.

10. Utilized other persons to “straw purchase” firearms, that is, the other person would purchase a firearm in his or her name intending to later illegally resell the firearms to the defendants, in order to have a steady supply of firearms for the members of the organization.

MEMBERS OF THE CONSPIRACY

11. Paragraphs 11 through 18 of Count Eight are realleged here.

12. Defendants GEORGE DORSEY [hereinafter DORSEY] and CHARLENE RESTUCCI [hereinafter RESTUCCI] knowingly maintained the premises at 2719 Smithers Street, Highland Gardens, Chester, Pennsylvania, for the purpose of manufacturing, storing and distributing cocaine, a Schedule II controlled substance and knowingly participated in the distribution of cocaine, a Schedule II controlled substance, on behalf of the organization.

OVERT ACTS

In furtherance of the conspiracy, and in order to accomplish its objects, the following overt acts, among others, were performed by the defendants in Chester, Delaware County, in the Eastern District of Pennsylvania and elsewhere:

1. In or about 1996, defendants JAMAIN WILLIAMS and VINCENT WILLIAMS began distributing cocaine in the area of Boyle and Culhane Streets in the Highland Gardens section of Chester, Pennsylvania.

2. On various occasions between 1996 and 2002, defendant JAMAIN WILLIAMS possessed with the intent to distribute cocaine, distributed cocaine, and received the proceeds from the distribution of cocaine.

3. On various occasions between 1996 and 2002, defendant VINCENT WILLIAMS possessed with the intent to distribute cocaine, distributed cocaine, and received the proceeds from the distribution of cocaine.

4. On various occasions between 1996 and 2002, defendant BRIAN ROGERS possessed with the intent to distribute cocaine, distributed cocaine, and received the proceeds

from the distribution of cocaine.

5. On various occasions between 1996 and 2002, defendant ANDRE COOPER possessed with the intent to distribute cocaine and distributed cocaine.

6. On various occasions between 1996 and 2002, defendant MARK ROGERS possessed with the intent to distribute cocaine and distributed cocaine.

7. On various occasions between 1996 and 2002, defendant SHANE TAYLOR possessed with the intent to distribute cocaine and distributed cocaine.

8. On various occasions between 1996 and 2002, defendant RASHEE GRANT possessed with the intent to distribute cocaine and distributed cocaine.

9. On various occasions between 1996 and 2002, defendant DAMIR ROBERTS possessed with the intent to distribute cocaine and distributed cocaine.

10. On various occasions between 1996 and 2000, prior to his murder, juvenile Antonio Rykard possessed with the intent to distribute cocaine and distributed cocaine.

11. From in or about 1996 through in or about 2002, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, BRIAN ROGERS, ANDRE COOPER, MARK ROGERS, SHANE TAYLOR, RASHEE GRANT, DAMIR ROBERTS, and others known and unknown to the grand jury, stored cocaine in “stash” or hiding spots. One location used for “stash” was the yard of 1214 Culhane Street in Chester, including, but not limited to, the clothesline bag, under the picnic table, near the fence line, and in the trash cans of 1214 Culhane Street. Another location used for “stash” was an abandoned house located near the intersection of Culhane and Boyle Streets in Chester.

12. From in or about 1996 through in or about 2002, defendants JAMAIN

WILLIAMS, VINCENT WILLIAMS, BRIAN ROGERS, ANDRE COOPER, MARK ROGERS, and SHANE TAYLOR utilized juveniles to sell Boyle Street Boys' cocaine.

13. On or about October 9, 1997, at Swartz and Culhane Streets in Chester, defendant SHANE TAYLOR possessed with the intent to distribute 16 packets of cocaine and \$75.

14. On or about December 1, 1997, at 2712 Boyle Street in Chester, defendant MARK ROGERS possessed with the intent to distribute 16 packets of cocaine and \$238.

15. On or about January 17, 1998, at 2726 Boyle Street in Chester, defendants JAMAIN WILLIAMS and VINCENT WILLIAMS possessed with the intent to distribute a packet of cocaine, approximately \$1,000 cash, a Harrington and Richardson .32 caliber revolver, serial number AS28430, and drug packaging paraphernalia, including dozens of new empty ziplock baggies used for packaging cocaine, razors used for packaging and separating cocaine, and inositol, a substance used to "cut," that is, a filler used increase the overall bulk weight of, cocaine.

16. On or about May 11, 1998, at Boyle and Culhane Streets in Chester, defendant SHANE TAYLOR provided a packet of cocaine to a person who in turn sold that packet of cocaine to an undercover police officer for \$100.

17. On or about March 2, 1999, at 2626 Boyle Street in Chester, defendant JAMAIN WILLIAMS possessed with the intent to distribute four packets of cocaine and \$820.

18. On or about March 2, 1999, at 2703 Boyle Street in Chester, defendant JAMAIN WILLIAMS threatened to injure a person known to the grand jury who told him to move from in front of 2703 Boyle Street where defendant JAMAIN WILLIAMS was selling cocaine.

19. From in or about 1998 through in or about 2001, defendants JAMAIN

WILLIAMS, VINCENT WILLIAMS, ANDRE COOPER, and MARK ROGERS used the location of 1210 Culhane Street in Chester to package and store cocaine used by the defendants in their cocaine distribution.

20. In or about June 1999, defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, and ANDRE COOPER agreed to murder Karriem Washington, a rival drug dealer who threatened their authority and showed the Boyle Street Boys disrespect.

21. In or about early July 1999, defendant ANDRE COOPER obtained a white van stolen by a source in Delaware to utilize in the murder of Karriem Washington.

22. On or about July 10, 1999, to maintain their position of power and status in the area in which they dealt drugs, defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, and ANDRE COOPER drove through Highland Gardens in the white van with the intent to kill Karriem Washington when they found him.

23. On or about July 10, 1999, to maintain his position of power and status in the area in which the Boyle Street Boys dealt drugs, defendant ANDRE COOPER shot and killed Karriem Washington in the 1200 block of Culhane Street in Highland Gardens, Chester.

24. From in or about 1999 to in or about 2001, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, BRIAN ROGERS, ANDRE COOPER, MARK ROGERS, and SHANE TAYLOR used the location of 2702 Boyle Street in Chester to store cocaine as well as firearms used by the defendants in their cocaine distribution.

25. On or about January 8, 2000, at Boyle and Culhane Streets in Chester, defendants MARK ROGERS and ANDRE COOPER, both wearing bullet proof vests, possessed with the

intent to distribute 137 packets of cocaine, along with three firearms, a loaded Colt .45 caliber semi-automatic pistol, serial number 1708-M2, a loaded Colt .45 caliber semi-automatic pistol, serial number 555954, and a Rossi .38 caliber revolver, serial number 82565.

26. In or about March 2000, defendants VINCENT WILLIAMS, BRIAN ROGERS, JAMAIN WILLIAMS, ANDRE COOPER, and MARK ROGERS agreed that Antonio Rykard, a juvenile and one of the Boyle Street Boys' youngboys, had to be killed because they feared that he was "snitching," that is, providing information to law enforcement about the illegal activities of the Boyle Street Boys.

27. In or about April of 2000, defendants DAMIR ROBERTS and RASHEE GRANT, and others known to the grand jury, attacked and beat Antonio Rykard at the direction of defendants JAMAIN WILLIAMS and BRIAN ROGERS, because JAMAIN WILLIAMS and BRIAN ROGERS believed, and stated to others of the Boyle Street Boys, that Antonio Rykard was a "snitch."

28. On or about April 22, 2000, to maintain his position of power and status in the area in which he dealt drugs, defendant JAMAIN WILLIAMS shot and killed Randolph Harris outside DeMarcos store in Highland Gardens, Chester.

29. On or about April 23, 2000, and soon after Antonio Rykard's last arrest and release from custody on or about April 23, 2000, defendant JAMAIN WILLIAMS told defendants VINCENT WILLIAMS, ROGERS, ANDRE COOPER, and MARK ROGERS, that Antonio Rykard definitely had to be killed soon because of concerns that he was "snitching."

30. On or about April 25, 2000, defendant ANDRE COOPER picked up Antonio

Rykard in Highland Gardens in a rented white SUV with the intent to lure Antonio Rykard into a vehicle and take him to a location where Antonio Rykard could be killed.

31. On or about April 25, 2000, defendant ANDRE COOPER drove Antonio Rykard, to Philadelphia's Fairmount Park where he parked the white SUV on a side road.

32. On or about April 25, 2000, to maintain his position of power and status in the area in which he dealt drugs, and to insure that Antonio Rykard did not provide damaging information to law enforcement about the Boyle Street Boys, defendant VINCENT WILLIAMS dragged Antonio Rykard from the white SUV and shot and killed Antonio Rykard by shooting him multiple times in the head and face.

33. In or about May 2000, after the discovery of Antonio Rykard's body in Fairmont Park in Philadelphia, members of the Boyle Street Boys warned others that that was what happened to someone who "snitched" on their drug organization.

34. In or about May 2000, after the police began investigating the murder of Antonio Rykard, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS and BRIAN ROGERS threatened a person known to the grand jury, a friend of Antonio Rykard's, telling the friend of Antonio Rykard's not to speak to the police.

35. From in or about 2000 through 2002, defendants DORSEY and RESTUCCI maintained the premises at 2719 Smithers Street, Highland Gardens, Chester, Pennsylvania, for the purpose of manufacturing, storing and distributing cocaine for the Boyle Street Boys.

36. From in or about 2000 through 2002, defendants DORSEY and RESTUCCI sold cocaine on behalf of the Boyle Street Boys organization run by defendants JAMAIN WILLIAMS and VINCENT WILLIAMS.

37. From in or about 2000 through in or about 2002, defendants JAMAIN WILLIAMS, VINCENT WILLIAMS, ANDRE COOPER, BRIAN ROGERS, SHANE TAYLOR, RASHEE GRANT, and DAMIR ROBERTS used 2719 Smithers in Chester as a location to distribute, manufacture, and store Boyle Street Boys' cocaine.

38. On or about October 9, 2000, at 2702 Boyle Street in Chester, defendant VINCENT WILLIAMS, wearing a bulletproof vest, was arrested and recovered was a loaded firearm, a Desert Eagle .44 caliber semi-automatic pistol, serial number 95253310 (which was later determined to have been purchased by Tracey Saunders on September 19, 2000), along with an additional magazine loaded with ammunition.

39. On or about October 9, 2000, at 2702 Boyle Street in Chester, defendant ANDRE COOPER, wearing a bulletproof vest, was arrested and recovered was a loaded firearm, a Ruger .40 caliber semi-automatic pistol, serial number 340-75277 (which was later determined to have been purchased by Tracey Saunders on September 6, 2000), along with a packet of cocaine intended for distribution and \$120.

40. In or about the fall of 2000, defendant BRIAN ROGERS agreed to pay a person known to the grand jury \$450 per firearm for the person known to the grand jury to purchase new 9 mm. semi-automatic firearms for BRIAN ROGERS.

41. In or about the fall of 2000, a day after the overt act in paragraph #40, defendant VINCENT WILLIAMS paid \$450 to a person known to the grand jury for one of the new 9 mm. semi-automatic firearms ordered by defendant BRIAN ROGERS.

42. In or about the fall of 2000, a few days after the overt act in paragraph #40, defendant BRIAN ROGERS paid \$450 to a person known to the grand jury for a new 9 mm.

semi-automatic firearm.

43. In or about the fall of 2000, a few days after the overt act in paragraph #40, defendant ANDRE COOPER paid \$450 to a person known to the grand jury for one of the new 9 mm. semi-automatic firearms ordered by defendant BRIAN ROGERS.

44. In or about the summer of 2001, defendant JAMAIN WILLIAMS told a person known to the grand jury to give Tracey Saunders a message that Tracey Saunders should watch what she says and keep his name out of it.

45. On or about July 11, 2001, defendant BRIAN ROGERS possessed with the intent to distribute one packet (an “eightball”) of cocaine, which BRIAN ROGERS had agreed to sell to an undercover agent.

46. In or about August 2001, defendants VINCENT WILLIAMS, BRIAN ROGERS, JAMAIN WILLIAMS, ANDRE COOPER, MARK ROGERS, and SHANE TAYLOR agreed that Tracey Saunders had to be killed because they feared that her cooperation with federal law enforcement and her testimony would lead to the incarceration of defendant VINCENT WILLIAMS.

47. On or about August 1, 2001, at 2719 Smithers Street in Chester, defendant DORSEY distributed two packets of cocaine to an undercover agent for \$40.

48. On or about August 2, 2001, at Boyle and Culhane Streets in Chester, defendant JAMAIN WILLIAMS possessed with the intent to distribute six packets of a white powder that field-tested positive for the presence of cocaine.

49. On or about August 28, 2001, at 2719 Smithers Street in Chester, defendants DORSEY and RESTUCCI distributed two packets of cocaine to an undercover agent for \$80.

50. In or about September 2001, defendant JAMAIN WILLIAMS convened a

meeting

where defendants VINCENT WILLIAM, JAMAIN WILLIAMS, and ANDRE COOPER urged, commanded, and induced the other three, defendants BRIAN ROGERS, MARK ROGERS, and SHANE TAYLOR, to commit the murder by telling them it was “their turn” and that they, JAMAIN WILLIAMS, VINCENT WILLIAMS, and ANDRE COOPER, “needed insurance” on BRIAN ROGERS, MARK ROGERS, and SHANE TAYLOR, meaning that JAMAIN WILLIAMS, VINCENT WILLIAMS, and ANDRE COOPER had each already murdered someone on behalf of the Boyle Street Boys and that BRIAN ROGERS, MARK ROGERS, and SHANE TAYLOR had not and needed to do so to prove their loyalty to the Boyle Street Boys.

51. On various occasions between the meeting described in Paragraph 50 above and October 8, 2001, defendants VINCENT WILLIAMS, JAMAIN WILLIAMS, and ANDRE COOPER urged defendants BRIAN ROGERS, MARK ROGERS, and SHANE TAYLOR to kill Tracey Saunders.

52. In or about early October 2001, defendants BRIAN ROGERS, MARK ROGERS, and SHANE TAYLOR agreed to take turns lying in wait to murder Tracey Saunders when Tracey Saunders exited her home in the evening hours on her way to work.

53. On or about October 6, 2001, in the evening hours, defendant SHANE TAYLOR, armed with a gun, hid on 2700 block of Smithers Street watching Tracey Saunder’s home with the intent to murder Tracey Saunders if she exited her home that night.

54. On or about October 7, 2001, in the evening hours, defendant MARK ROGERS, armed with a gun, hid on 2700 block of Smithers Street watching Tracey Saunder’s home with the intent to murder Tracey Saunders if she exited her home that night.

55. On or about October 8, 2001, in the evening hours, defendant BRIAN ROGERS,

armed with a gun, hid on 2700 block of Smithers Street watching Tracey Saunder's home with the intent to murder Tracey Saunders if she exited her home that night.

56. On or about October 8, 2001, defendant ANDRE COOPER provided gloves, a mask, a "hoodie," and a loaded firearm to defendant BRIAN ROGERS to use in the planned shooting of Tracey Saunders.

57. On or about October 8, 2001, defendant ANDRE COOPER waited in a getaway car for BRIAN ROGERS to use to escape in from Highland Gardens after committing the murder of Tracey Saunders.

58. On or about October 8, 2001, defendant JAMAIN WILLIAMS, accompanied by defendant SHANE TAYOR, drove around Highland Gardens and maintained contact with BRIAN ROGERS via cellphone with BRIAN ROGERS while BRIAN ROGERS waited for Tracey Saunders to exit her home. Upon driving up the 2700 block of Smithers Street and seeing Tracey Saunders in her car, defendant JAMAIN WILLIAMS contacted defendant BRIAN ROGERS and told ROGERS that he could get her and to "do it," meaning to kill Tracey Saunders.

59. On or about October 8, 2001, to maintain his position of power and status in the area in which he dealt drugs, and to insure that Tracey Saunders did not provide damaging information to law enforcement about the Boyle Street Boys, defendant BRIAN ROGERS shot and killed Tracey Saunders by shooting her twice in the head at point-blank range.

60. On or about October 8, 2001, defendant ANDRE COOPER drove defendant BRIAN ROGERS away from the scene of Tracey Saunder's murder.

61. On or about October 8, 2001, defendants BRIAN ROGERS and ANDRE COOPER disposed of the firearm used to kill Tracey Saunders when defendant ANDRE

COOPER pulled the vehicle to the side of the road and drove slowly while defendant BRAIN ROGERS threw the firearm out the window of the vehicle over the side of a bridge.

62. In or about spring of 2002, defendant JAMAIN WILLIAMS asked a person known to the grand jury to find an eyewitness to defendant BRIAN ROGERS' murder of Tracey Saunders and tell the eyewitness to change the eyewitness' testimony.

63. On or about June 12, 2002, at 2703 Smithers Street in Chester, defendant DAMIR ROBERTS possessed with the intent to distribute three packets of cocaine.

64. On or about July 8, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed one packet of cocaine to an undercover agent for \$160.

65. On or about August 26, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed two packets of cocaine to an undercover agent for \$300.

66. On or about August 29, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed two packets of cocaine to an undercover agent for \$300.

67. On or about September 5, 2002, at 2719 Smithers Street in Chester, defendant DAMIR ROBERTS distributed one packet of cocaine to an undercover agent for \$480.

68. On or about September 23, 2002, at 2719 Smithers Street in Chester, defendant SHANE TAYLOR distributed one packet of cocaine to an undercover agent for \$250.

69. On or about September 26, 2002, at 2719 Smithers Street in Chester, defendant RASHEE GRANT agreed to distributed two "eightballs" (that is, approximately seven grams of cocaine) to an undercover agent for \$300.

70. On or about October 7, 2002, at 2719 Smithers Street in Chester, defendant RASHEE GRANT distributed five packets of cocaine to an undercover agent for \$60.

71. On or about October 7, 2002, at 2719 Smithers Street in Chester, defendant

RASHEE GRANT distributed one packet of cocaine to an undercover agent for \$180.

72. On or about October 23, 2002, at 2719 Smithers Street in Chester, defendant ANDRE COOPER distributed one packet of cocaine to an undercover agent for \$300.

73. On or about October 29, 2002, at 2719 Smithers Street in Chester, defendants ANDRE COOPER and SHANE TAYLOR distributed one packet of cocaine to an undercover agent for \$275.

74. On or about November 13, 2002, at 2719 Smithers Street in Chester, defendant SHANE TAYLOR distributed one packet of cocaine to an undercover agent for \$450.

All in violation of Title 21, United States Code, Section 846.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12 and Overt Acts 1 through 74 of Count Twenty-Five of this Indictment are realleged here.

2. From in or about 1996 to in or about December 2002, in the Eastern District of Pennsylvania, the defendants

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"
BRIAN ROGERS,
a/k/a "B,"
JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"
ANDRE COOPER,
a/k/a "Dre,"
MARK ROGERS,
a/k/a "Black Mark,"
SHANE TAYLOR,
RASHEE GRANT,
a/k/a "Bae-Bae," and
DAMIR ROBERTS,
a/k/a "Dams,"

conspired and agreed with others known and unknown to the grand jury to knowingly and intentionally distribute more than 5 kilograms of a mixture or substance containing cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Chester Charter School, a public elementary-middle school, located at 2717 West 10th Street, in Chester, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 860.

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 1998, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed, and aided and abetted the distribution of, a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 2.

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 1999, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

JAMAIN WILLIAMS,
a/k/a "JarMain,"
a/k/a "Jay,"
a/k/a "Main,"

knowingly and intentionally possessed with the intent to distribute four packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute of, approximately 137 packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, weighing approximately 58 grams.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
MARK ROGERS,
a/k/a "Black Mark,"

knowingly possessed, and aided and abetted the possession of, firearms, that is, a loaded Colt .45 caliber semi-automatic pistol, serial number 1708-M2, a loaded Colt .45 caliber semi-automatic pistol, serial number 555954, and a Rossi .38 caliber revolver, serial number 82565, in furtherance of a drug trafficking crime, for which each may be prosecuted in a court of the United States, that is, the possession with the intent to distribute cocaine, as charged in Count Twenty-Nine Indictment and conspiracy to distribute cocaine, as charged in Count Twenty-Five of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally possessed with the intent to distribute a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2000, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly used and carried a firearm, that is, a loaded Ruger .40 caliber semi-automatic pistol, serial number 340-75277, during and in relation to a drug trafficking crime, for which each may be prosecuted in a court of the United States, that is, the possession with the intent to distribute cocaine, as charged in Count Thirty of this Indictment and conspiracy to distribute cocaine, as charged in Count Twenty-Five of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 11, 2001, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

BRIAN ROGERS,
a/k/a "B,"

knowingly and intentionally distributed a packet of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally possessed with the intent to distribute three packets of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 8, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 1.4 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 26, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance weighing approximately 3.9 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed two packets of a mixture or substance weighing approximately 5.7 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 5, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

DAMIR ROBERTS,
a/k/a "Dams,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 12.0 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 6.9 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

RASHEE GRANT,
a/k/a "Bae-Bae,"

knowingly and intentionally distributed five packets of a mixture or substance weighing approximately 1.1 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

RASHEE GRANT,
a/k/a "Bae-Bae,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 3.0 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

ANDRE COOPER,
a/k/a "Dre,"

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 7.3 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendants

ANDRE COOPER,
a/k/a "Dre," and
SHANE TAYLOR

knowingly and intentionally distributed, and aided and abetted the distribution of, a packet of a mixture or substance weighing approximately 3.8 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 13, 2002, at Chester, Delaware County, in the Eastern District of Pennsylvania, the defendant

SHANE TAYLOR

knowingly and intentionally distributed a packet of a mixture or substance weighing approximately 14.9 grams and containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371, 924(a)(1)(A), and 2 set forth in Counts One through Seven of this indictment, the defendant

VINCENT WILLIAMS,
a/k/a "Tate,"
a/k/a "Taterhead,"

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28 United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (a) An Intratec nine millimeter semiautomatic pistol, Model AB10, serial number A053796;
- (b) A Taurus nine millimeter semi-automatic pistol, Model PT99AF, serial number TJP54335;
- (c) An Intratec nine millimeter semi-automatic pistol, Model AB10, serial number A051956;
- (d) A Ruger forty caliber semi-automatic pistol, Model P944T, serial number 340-75277;
- (e) A Ruger forty-five caliber semi-automatic pistol, Model P90T, serial number 661-80733; and
- (f) A Magnum Research forty-four caliber semi-automatic pistol, Model Desert Eagle, serial number 95253310.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

NOTICE OF SPECIAL FINDINGS

THE GRAND JURY FURTHER FINDS THAT:

1. As to Counts Ten, Eleven, and Twelve, defendant VINCENT WILLIAMS:
 - a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Tracey Saunders died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Tracey Saunders died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Tracey Saunders [Title 18, United States Code, Section 3592(c)(9)].

2. As to Counts Ten, Eleven, Twelve, and Thirteen, defendant BRIAN ROGERS:
 - a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally killed Tracey Saunders [Title 18, United States Code, Section 3591(a)(2)(A)];
 - c. Intentionally inflicted serious bodily injury that resulted in the death of Tracey Saunders [Title 18, United States Code, Section 3591(a)(2)(B)];and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Tracey Saunders [Title 18, United States Code, Section 3592(c)(9)].

3. As to Counts Ten, Eleven, and Twelve, defendant JAMAIN WILLIAMS:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Tracey Saunders died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Tracey Saunders died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Tracey Saunders [Title 18, United States Code, Section 3592(c)(9)].

4. As to Counts Ten, Eleven, and Twelve, defendant ANDRE COOPER:
 - a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Tracey Saunders died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Tracey Saunders died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Tracey Saunders [Title 18, United States Code, Section 3592(c)(9)].

5. As to Counts Fifteen and Sixteen, defendant VINCENT WILLIAMS:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally killed Antonio Rykard [Title 18, United States Code, Section 3591(a)(2)(A)];
 - c. Intentionally inflicted serious bodily injury that resulted in the death of Antonio Rykard [Title 18, United States Code, Section 3591(a)(2)(B)];and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Antonio Rykard [Title 18, United States Code, Section 3592(c)(9)].

6. As to Count Fifteen, defendant ANDRE COOPER:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Antonio Rykard died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Antonio Rykard died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Antonio Rykard [Title 18, United States Code, Section 3592(c)(9)].

7. As to Counts Eighteen and Nineteen, defendant JAMAIN WILLIAMS:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally killed Randolph Harris [Title 18, United States Code, Section 3591(a)(2)(A)];
 - c. Intentionally inflicted serious bodily injury that resulted in the death of Randolph Harris [Title 18, United States Code, Section 3591(a)(2)(B)];
 - d. In the commission of the offense knowingly created a grave risk of death to another person, David Jones [Title 18, United States Code, Section 3592(c)(5); and
 - e. Committed the offense after substantial planning and premeditation to cause the death of a person, Randolph Harris [Title 18, United States Code, Section 3592(c)(9)].

8. As to Count Twenty-Two, defendant VINCENT WILLIAMS:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Karriem Washington died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Karriem Washington died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Karriem Washington [Title 18, United States Code, Section 3592(c)(9)].

9. As to Count Twenty-Two, defendant JAMAIN WILLIAMS:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that Karriem Washington died as a direct result of that act [Title 18, United States Code, Section 3591(a)(2)(C)];
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Karriem Washington died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)]; and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Karriem Washington [Title 18, United States Code, Section 3592(c)(9)].

10. As to Counts Twenty-Two and Twenty-Three, defendant ANDRE COOPER:
- a. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];
 - b. Intentionally killed Karriem Washington [Title 18, United States Code, Section 3591(a)(2)(A)];
 - c. Intentionally inflicted serious bodily injury that resulted in the death of Karriem Washington [Title 18, United States Code, Section 3591(a)(2)(B)];and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person, Karriem Washington [Title 18, United States Code, Section 3592(c)(9)].

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney